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(ENDORSED)  
FILED  
SEP 11 2019  
Clerk of the Court  
Superior Court of CA County of Santa Clara  
BY B. THAN DEPUTY

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9  
10 COUNTY OF SANTA CLARA

11 **PEOPLE OF THE STATE OF  
12 CALIFORNIA,**

13 Plaintiff,

14 v.

15 JING CHIANG HUANG aka "Lili" (9/7/53),  
16 SHU MEI LIN aka "Shelly" (2/1/62),  
17 SHAO LEE aka "Cindy" (6/16/69),  
18 PEIHSIN LEE aka "Boss Lili" (12/18/57),  
19 PENGCHENG CAI aka "Bao Bao"  
(12/3/87),  
DAFENG WEN (10/2/87),

20 Defendants.

Case No. C1912332

**SECOND AMENDED FELONY  
COMPLAINT**

Action Filed: June 26, 2019

21  
22 THE ATTORNEY GENERAL OF THE STATE OF CALIFORNIA accuses the above-  
23 named defendants of the following crimes, which are connected to one another in their  
24 commission:

25 **COUNT ONE**

26 On or between September 26, 2016, and October 13, 2019, in the County of Santa Clara,  
27 defendants **JING CHIANG HUANG, SHU MEI LIN, and SHAO LEE** committed the crime of  
28 **CONSPIRACY**, in violation of PENAL CODE SECTION 182(a)(1), in that they did unlawfully

conspire together, and with other persons whose identity is unknown, to commit the crime of HUMAN TRAFFICKING, in violation of PENAL CODE SECTION 236.1(b) a felony, and that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendants committed the following overt act(s) at and in the County of Santa Clara:

## OVER ACT 1

On March 16, 2016, defendant **JING CHIANG HUANG** transferred \$4,500 from her Bank of America account ending 4717 to defendant **SHU-MEI LIN'S** Bank of America account ending 0333.

## OVER ACT 2

On April 21, 2016, defendant **SHAO LEE** paid \$500 to Backpage.com for advertisements associated with the email [cindylee@gmail.com](mailto:cindylee@gmail.com).

### OVER ACT 3

On September 26, 2016, defendant **SHU MEI LIN** traveled from her home in San Jose to meet YL at the Premier Inn.

## OVER ACT 4

Defendant **JING CHIANG HUANG** arranged for the October 7, 2016 activation of a phone that was later provided to YL.

## OVER ACT 5

Between October 6, 2016, and October 13, 2016, defendant **JING CHIANG HUANG** called defendant **SHAO LEE** at least five times.

## OVER ACT 6

Between October 6, 2016, and October 11, 2016, defendant **SHAO LEE** called defendant **JING CHIANG HUANG** at least four times.

## OVER ACT 7

In October 2016, SHAO LEE used her [cindylee@gmail.com](mailto:cindylee@gmail.com) email address to post advertisements featuring photos of young Asian women available to provide “Incall” in exchange for cash.

## OVER ACT 8

On October 8, 2016, defendant **SHU MEI LIN** called YL and told her she was not free to leave the Premier Inn and would be performing sex act in exchange for money there.

## OVERT ACT 9

Between October 8, 2016, and October 13, 2016, while YL was at the Premier Inn, defendant **JING CHIANG HUANG** called YL 6 times.

## OVER ACT 10

On October 9, 2016, defendant **SHAO LEE** called YL and informed her that a customer had arrived to the Premier Inn for her.

## OVER ACT 11

On October 13, 2016, defendant **SHAO LEE** directed a Ventura County Sheriff's Detective to Room 118 of the Premier Inn to meet "Sammy," later identified as YL.

## OVER ACT 12

On December 30, 2016, defendant **JING CHIANG HUANG** accompanied defendant **SHU MEI LIN** to an ATM where defendant **SHU MEI LIN** deposited \$7,160 in cash into her Bank of America account ending in 0333.

## OVER ACT 13

On March 1, 2017, defendant **JING CHIANG HUANG** provided housing for a commercial sex worker was on “rest for period.”

## OVERT ACT 14

On September 29, 2017, JING CHIANG HUANG used her home for a condom unwrapping operation.

## OVER ACT 15

In October 2016, defendant **SHAO LEE** telephonically directed commercial sex buyers to multiple brothel locations.

## **COUNT TWO**

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Count One: On or between June 1, 2019, and July 7, 2019, in the County of Santa Clara, defendants **JING CHIANG HUANG, PEIHSIN LEE, PENGCHENG CAI, and DAFENG WEN** committed the crime of CONSPIRACY, in violation of PENAL CODE SECTION 182(a)(1), in that they did unlawfully conspire together, and with other persons whose identity is unknown, to commit the crime of HUMAN TRAFFICKING, in violation of PENAL CODE SECTION 236.1(b) a felony, and that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendants committed the following overt act(s) at and in the County of Santa Clara:

## OVERT ACT 1

On or between June 1, 2019, and June 26, 2019, **PENGCHENG CAI** directed ZW to work at various brothel locations.

## OVER ACT 2

On or between June 1, 2019, and June 26, 2019, **PENGCHENG CAI** collected money from ZW.

### OVERT ACT 3

On or between June 1, 2019, and June 26, 2019, **PENGCHENG CAI** threatened ZW regarding future job opportunities if she stopped working for him.

## OVER ACT 4

On or between June 1, 2019, and June 26, 2019, **DAFENG WEN** directed commercial sex buyers to brothel locations.

## OVER ACT 5

On or between June 1, 2019, and June 26, 2019, **DAFENG WEN** directed the collection of money earned from commercial sex acts.

## OVERT ACT 6

On or between June 1, 2019, and June 26, 2019, **DAFENG WEN** directed the commission of particular sex acts as requested by commercial sex buyers.

## OVER ACT 7

On or between June 1, 2019, and June 26, 2019, **DAFENG WEN** arranged the distribution of condoms to brothel locations.

## OVER ACT 8

On June 26, 2019, JING CHIANG HUANG stored ZW's passport at JING CHIANG HUANG'S residence on Clifton.

### OVER ACT 9

On July 2, 2019, JING CHIANG HUANG asked PEIHSIN LEE and PENGCHENG CAI to collect debts owed to her.

## OVER ACT 10

On July 2, 2019, PENGCHENG CAI told JING CHIANG HUANG he would give her money he collected from four locations.

## OVERT ACT 11

On July 3, 2019, PEIHSIN LEE told ZW to pay whatever she makes committing commercial sex acts to JING CHIANG HUANG.

## OVER ACT 12

On July 7, 2019, JING CHIANG HUANG called PEIHSIN LEE and directed her to have a 3<sup>rd</sup> party delete pictures of prostitutes on his phone.

### **COUNT THREE**

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Two: On or between September

1 26, 2016, and October 13, 2019, in the County of Santa Clara, defendants **JING CHIANG**  
2 **HUANG, SHAO LEE, and SHU MEI LIN** committed the crime of HUMAN TRAFFICKING  
3 FOR A SEX ACT, a violation of PENAL CODE SECTION 236.1(b), a Felony, in that they did  
4 willfully and unlawfully deprive and/or violate the personal liberty of YL with the intent to  
5 maintain a violation of PENAL CODE SECTION 266h.

6 **COUNT FOUR**

7 For a further and separate cause of action, being a different offense from but connected in  
8 its commission as the charges set forth in Counts One through Three: On or between June 1,  
9 2019, and July 7, 2019, in the County of Santa Clara, defendant **JING CHIANG HUANG**  
10 committed the crime of HUMAN TRAFFICKING FOR A SEX ACT, a violation of PENAL  
11 CODE SECTION 236.1(b), a Felony, in that she did willfully and unlawfully deprive and/or  
12 violate the personal liberty of ZW with the intent to maintain a violation of PENAL CODE  
13 SECTION 266h.

14 **COUNT FIVE**

15 For a further and separate cause of action, being a different offense from but connected in  
16 its commission as the charges set forth in Counts One through Four: On or between June 1, 2019,  
17 and September 10, 2019, in the County of Santa Clara, defendants **PEIHSIN LEE** and  
18 **PENGCHENG CAI** committed the crime of HUMAN TRAFFICKING FOR A SEX ACT, a  
19 violation of PENAL CODE SECTION 236.1(b), a Felony, in that they did willfully and  
20 unlawfully deprive and/or violate the personal liberty of ZW with the intent to maintain a  
21 violation of PENAL CODE SECTION 266h.

22 **COUNT SIX**

23 For a further and separate cause of action, being a different offense from but connected in  
24 its commission as the charges set forth in Counts One through Four: On or between April 15,  
25 2018, and September 10, 2019, in the County of Santa Clara, defendants **PENGCHENG CAI**  
26 and **DAFENG WEN** committed the crime of HUMAN TRAFFICKING, a violation of PENAL  
27  
28

1 CODE SECTION 236.1(a), a Felony, in that they did willfully and unlawfully deprive and/or  
2 violate the personal liberty of CW with the intent to obtain forced labor or services.  
3

4 **COUNT SEVEN**  
5

6 For a further and separate cause of action, being a different offense from but connected in  
7 its commission as the charges set forth in Counts One through Five: On or about April 12, 2015,  
8 in the county of Santa Clara, defendant **JING CHIANG HUANG** committed the crime of  
9 **FILING FALSE TAX RETURN** in violation of REVENUE AND TAXATION CODE SECTION  
10 19706, a felony, in that she did willfully and with like intent, make, render, or verify a false or  
11 fraudulent return or statement, to wit: 2014 California Resident Income Tax Return.  
12

13 **COUNT EIGHT**  
14

15 For a further and separate cause of action, being a different offense from but connected in  
16 its commission as the charges set forth in Counts One through Six: On or about April 18, 2016, in  
17 the county of Santa Clara, defendant **JING CHIANG HUANG** committed the crime of  
18 **FAILURE TO FILE TAX RETURN** in violation of REVENUE AND TAXATION CODE  
19 SECTION 19706, a felony, in that she being a person required by law to file a tax return or to  
20 supply information, did willfully fail to file a tax return or supply information for the period  
21 January 1, 2015, through December 31, 2015, with the intent to evade tax, to wit: 2015 California  
22 Resident Income Tax Return.  
23

24 **COUNT NINE**  
25

26 For a further and separate cause of action, being a different offense from but connected in  
27 its commission as the charges set forth in Counts One through Seven: On or about April 18, 2017,  
28 in the county of Santa Clara, defendant **JING CHIANG HUANG** committed the crime of  
January 1, 2016, through December 31, 2016, with the intent to evade tax, to wit: 2016 California  
Resident Income Tax Return.  
7

## COUNT TEN

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Eight: On or between November 25, 2016, and December 1, 2016, in the county of Santa Clara, defendant **JING CHIANG HUANG** committed the crime of MONEY LAUNDERING in violation of PENAL CODE SECTION 186.10(a)(2), a felony, in that she willfully and unlawfully conducted transactions involving monetary instruments of a total value exceeding \$5,000, to wit: \$8,807.72 deposited into an account at Citibank, N.A., knowing that such monetary instrument or instruments represent the proceeds of, or is derived directly from the proceeds of criminal activity.

## COUNT ELEVEN

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Nine: On September 21, 2016, in the county of Santa Clara, defendant **SHAO LEE** committed the crime of **MONEY LAUNDERING** in violation of PENAL CODE SECTION 186.10(a)(2), a felony, in that she willfully and unlawfully conducted transactions involving monetary instruments of a total value exceeding \$25,000, to wit: \$55,000 deposited into an account at Wells Fargo Bank, N.A., knowing that such monetary instrument or instruments represent the proceeds of, or is derived directly from the proceeds of criminal activity.

## COUNT TWELVE

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Ten: On or between October 3, 2016, and October 6, 2016, in the county of Santa Clara, defendant **SHAO LEE** committed the crime of MONEY LAUNDERING in violation of PENAL CODE SECTION 186.10(a)(2), a felony, in that she willfully and unlawfully conducted transactions involving monetary instruments of a total value exceeding \$5,000, to wit: \$13,841 deposited into an account at Wells Fargo Bank, N.A., knowing that such monetary instrument or instruments represent the proceeds of, or is derived directly from the proceeds of criminal activity.

## COUNT THIRTEEN

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Eleven: On December 30, 2016, in the county of Santa Clara, defendant **SHU MEI LIN** committed the crime of MONEY LAUNDERING in violation of PENAL CODE SECTION 186.10(a)(2), a felony, in that she willfully and unlawfully conducted transactions involving monetary instruments of a total value exceeding \$5,000, to wit: \$7,160 deposited into an account at Bank of America, N.A., knowing that such monetary instrument or instruments represent the proceeds of, or is derived directly from the proceeds of criminal activity.

**SPECIAL ALLEGATION ONE – STATUS ALLEGATION/FELONIES EXEMPT FROM  
LOCAL CUSTODY**

It is further alleged that prison custody time for the felony offenses charged in counts Three through Five are to be served in state prison pursuant to PENAL CODE SECTION 1170.

**NOTICE:** Conviction of the offenses charged in counts Three through Six will require the charged defendants to register pursuant to Penal Code section 290 et seq. Willful failure to register is a crime.

**NOTICE:** Conviction of these offenses will require the defendant to provide DNA samples and print impressions pursuant to Penal Code section 296 and 296.1. Willful refusal to provide the samples and impressions is a crime.

**NOTICE:** The People of the State of California intend to present evidence and seek jury findings regarding all applicable circumstances in aggravation, pursuant to Penal Code section 1170(b) and *Cunningham v. California* (2007) 549 U.S. 270 [127 S.Ct. 856, 166 L.Ed.2d 856].

**NOTICE:** Any allegation making a defendant ineligible to serve a state prison sentence in the county jail shall not be subject to dismissal pursuant to Penal Code section 1385.

I declare under the penalty of perjury that the foregoing is true and correct. Executed this  
10<sup>th</sup> day of September, 2019, at Santa Clara, California.

Respectfully Submitted,

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